



Ilan D. Scharf

June 5, 2025

212.561.7721
ischarf@pszjlaw.com

LOS ANGELES

10100 SANTA MONICA BLVD. 13TH FL.
LOS ANGELES, CALIFORNIA 90067-4003
310.277.6910

NEW YORK

1700 BROADWAY, 36TH FL.
NEW YORK, NEW YORK 10019
212.561.7700

WILMINGTON

919 NORTH MARKET STREET, 17TH FLOOR,
P.O. BOX 8705
WILMINGTON, DELAWARE 19899-8705
302.652.4100

HOUSTON

700 LOUISIANA STREET, STE. 4500
HOUSTON, TEXAS 77002
713.691.9385

SAN FRANCISCO

ONE SANSOME STREET, 34TH FL. STE. 3430
SAN FRANCISCO, CALIFORNIA 94104
415.263.7000

Via ECF

Judge Paul R. Warren
United States District Court
Western District of New York
100 State Street
Rochester, NY 14614

Re: **The Diocese of Rochester, Case No. 19-20905**

Dear Judge Warren:

We represent the Official Committee of Unsecured Creditors (the “Committee”) of the Diocese of Rochester (the “Diocese”). The Committee hereby joins in and incorporates herein by reference, the letter (the “JAA Letter”) filed by Jeff Anderson & Associates and Jeff Anderson dated June 4, 2025 [Doc. No. 3151] in opposition to the Motion for Expedited Briefing. CNA’s Motion to Compel is unnecessary in light of the Motion to Quash filed by the Committee. CNA can raise the same issues in opposition to the Motion to Quash and the question of whether the subpoenas will be enforced or quashed will be addressed at the hearing on the Motion to Quash. By filing the Motion to Compel, CNA is merely inviting parties to file two pleadings that are mirror images of each other because each party will have to file either a motion to compel/squash AND an opposition that present similar or identical arguments.

CNA’s purposefully last-minute motion requesting shortened notice is the latest example of its scorched earth approach to litigation over the plan. The line of argument pursued through the subpoenas at issue is irrelevant to confirmation and the unnecessary multitude of pleadings to address the same issue from different angles further demonstrates that CNA will leave no stone unturned and cause a waste of estate and judicial resources.



PACHULSKI
STANG
ZIEHL &
JONES

Judge Paul R. Warren
June 5, 2025
Page 2

Respectfully Submitted,

PACHULSKI STANG ZIEHL &
JONES LLP

/s/ Ilan D. Scharf

Ilan D. Scharf

cc: All counsel of record via ECF